

**U.S. Department of Justice**

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

271 Cadman Plaza East
Brooklyn, New York 11201

May 10, 2022

By Email and USAFx

Kevin K. Tung
c/o Kevin Kerveng Tung PC
136-20 38th Avenue, Suite 3D
Flushing, New York 11354

Re: United States v. Yong Zhu
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

| Description | Begin Bates | End Bates |
|--|-------------|-----------|
| Department of Homeland Security Records regarding international travel | YZ-005129 | YZ-005164 |
| Recording of interview | YZ-006144 | YZ-006144 |
| Department of State Records | YZ-005165 | YZ-005368 |
| TD Bank records | YZ-005369 | YZ-005755 |
| Navy Federal Credit Union records | YZ-005756 | YZ-005987 |
| Department of Homeland Security Records | YZ-005988 | YZ-005990 |
| Copies of Interpol Red Notices | YZ-005991 | YZ-006003 |

| Description | Begin Bates | End Bates |
|---|--------------------|------------------|
| Handwritten notes | YZ-006004 | YZ-006005 |
| New York Department of State records | YZ-006006 | YZ-006118 |
| New York Department of State records | YZ-006119 | YZ-006133 |
| Audio recording | YZ-006134 | YZ-006134 |
| Reports associated with data from search warrant No. 20-MC-2113 | YZ-006135 | YZ-006135 |
| Apple records | YZ-006136 | YZ-006136 |
| AT&T records | YZ-006137 | YZ-006137 |
| Paypal records | YZ-006138 | YZ-006138 |
| T-Mobile records | YZ-006139 | YZ-006139 |
| T-Mobile records | YZ-006140 | YZ-006140 |
| T-Mobile records | YZ-006141 | YZ-006141 |
| Yahoo, Inc. records | YZ-006142 | YZ-006142 |
| Yahoo, Inc. records | YZ-006143 | YZ-006143 |

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers the materials marked produced today that have been marked “SENSITIVE” to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)